REMARKS

I. Status of Claims

Claims 1-10 and 16-25 are pending in this application. In view of the above amendments and the following remarks, reconsideration and prompt early allowance are respectfully requested.

II. Claim Informalities

The Office Action indicated that Claim 8 had a possible typographical error. Claim 8 has been amended to correct this inadvertent typographical error.

III. Rejection under 35 U.S.C. §102(e)

Claims 1-10, 16-25 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No 6,789,231 to Reynar *et al.* (hereinafter "Reynar"). This rejection is respectfully traversed, as follows.

Claim 1 of the present invention is directed to a machine-readable medium having instructions stored thereon for execution by a processor to implement a computer program providing a language model service shareable among handlers for input devices. The machine-readable medium includes a pre-processing mode of operation, in which text is entered in order to create a document, and a correction mode of operation, in which corrections are made to the text. A language model service and first and second language models are used in both the pre-processing mode of operation and the correction mode of operation.

In contrast, Reynar teaches a stochastic input combiner 137 that may work in conjunction with a natural language model 220 to correct text. In Reynar, a user enters text into a computer, using one or more stochastic sources. See Reynar, col. 2, line 57- col. 3, line 9. A user may select a portion of the text to edit. See Reynar, col. 3, lines 10-22. Once a user has selected a

portion of text, a stochastic input combiner 137 is used to generate possible text corrections. The stochastic text combiner 137 generates possible text corrections based one or more stochastic models 270a, 270b, 270c, and optionally based on a natural language model 220. The user may select a possible text correction, which is used to replace the original text. See Reynar, col. 3, lines 22-53.

Applicants note that Reynar teaches a stochastic input combiner 137 and a natural language model 220 are used only to correct text. Reynar does not teach or suggest a language model service is used in conjunction with a language model in a pre-processing mode of operation.

In particular, the Applicants note that Reynar teaches that text is created by a user. Input 280, 290 is passed to a program module 230, 240 which may incorporate a stochastic model 270a, 270b, and used to create text in an application 210, such as a word processor. See col. 9, line 19-col. 10, line 15. Reynar does not disclose or suggest that the stochastic input combiner 137 is used during the creation of the text. Reynar teaches only that the stochastic input combiner 137 is used to **correct text at a later point**. Furthermore, Reynar teaches only that the stochastic input combiner 137 generates a list of alternatives and provides this list to a natural language model 220. See Reynar, col 12, lines 9-24. The stochastic input combiner 137 does not provide a list of alternatives or any other information to program modules 230, 240. Thus, the stochastic input combiner 137 does **not provide advice to the program modules** 230, 240 regarding text to be inserted into a document.

Furthermore, the natural language model 220 is used in conjunction with the stochastic input combiner 137 only to correct existing text. See Reynar, col. 12, lines 9-24. The natural

language model 220 is not used in the creation of the text. Thus, the text originally entered is **not based on the natural language model** 220.

In addition, because the stochastic input combiner 137 is used only to correct text selected by the user, the stochastic input combiner 137 only receives selections of text input **by a user**. See Reynar, col, 14, lines 65-67. The stochastic input combiner 137 does not receive selections of text from the program modules 230, 240.

Thus, Reynar does not teach or suggest a pre-processing mode of operation as recited in claim 1 of the present invention. In particular, Reynar does not teach or suggest "a pre-processing mode of operation in which the language model service is designed to receive a range within a document **from a handler** for an input device and in response **provide to the handler advice** regarding text under consideration by the handler to insert within the document at the range, wherein the handler relies on a first language model for determining text entry and the language model service relies on a second language model distinct from the first language model, the second language model related to a context of the document within range, the advice for consideration by the handler, wherein the handler determines and **enters text in order to create the document after considering conclusions of the first language model and the second language model**," as recited in claim 1 (emphasis added). Thus, claim 1 is patentable over the art of record.

Claims 8 and 23 contain language similar to that discussed above with reference to claim 1, and are patentable for reasons similar to those discussed above in reference to claim 1.

Claim 16 has been amended by this Response. In particular, claim 16 has been amended to recite the limitation "wherein the document was initially created in a pre-processing mode of operation in which the language model service received a range within a document from each of

the different handlers and in response provided to each of the handlers advice regarding text under consideration by the handlers to insert within the document at the range, wherein the language model service relied on the first language model, and wherein each of the handlers determined and entered text in order to create the document after considering conclusions of the first language model and another language model." The Applicants note that this language is similar to language recited in claim 1, and that claim 16 is now patentable for reasons similar to those discussed above in reference to claim 1.

Claims 2-7, 9-10, 17-22, and 24-25 depend from claims 1, 8, 16, and 23, respectively. As claims 1, 8, 16, and 23 are patentable over the art of record, so dependent claims 2-7, 9-10- 17-22, and 24-25 are patentable over the art of record.

IV. Statement of Common Ownership

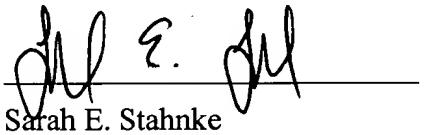
Applicants further note that, at the time the present invention was made, both Reynar and the present invention were owned by the same person or subject to an obligation of assignment to the same person. Accordingly, Applicants submit herewith a Statement of Common Ownership.

V. Conclusion

Applicants respectfully submit that claims 1-10 and 16-25 are now in condition for allowance. Allowance of all pending claims is respectfully requested. However, if the Examiner believes that any issues remain, he should feel free to contact the undersigned at the telephone number below. The Commissioner is hereby authorized to charge any additional fees that are required or credit any overpayment to Deposit Account No.19-2112 referencing MFCP 87508.

Respectfully submitted,

Dated: June 16, 2005



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